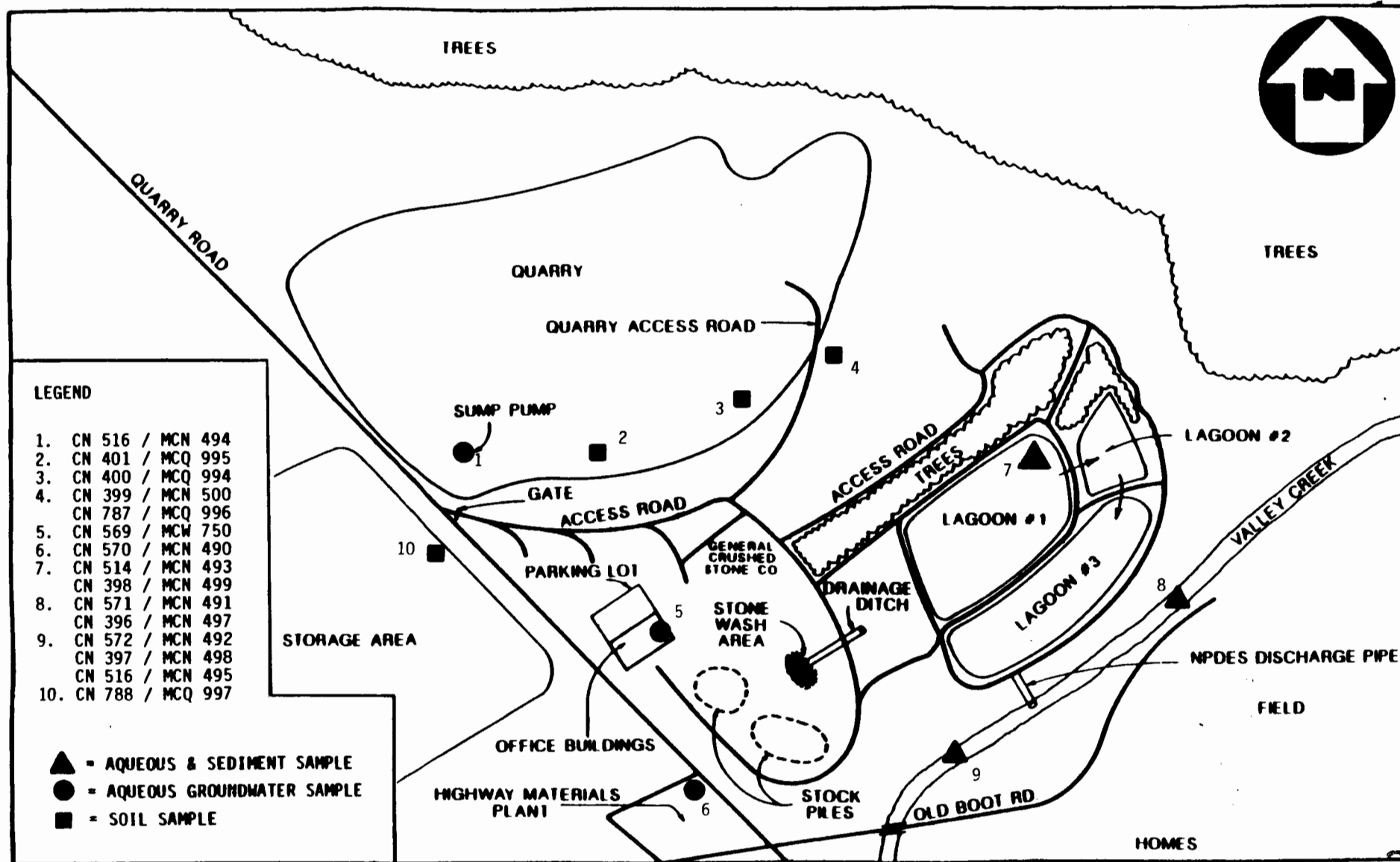


SITE SKETCH
HIGHWAY MATERIALS PLANT #6
 (NO SCALE)

FIGURE 2



ORIGINAL
 (Red)



SAMPLE LOCATION MAP
HIGHWAY MATERIALS PLANT #6
 (NO SCALE)

ORIGINAL
FILE

ATTACHMENT 2

TDD NUMBER FB-5807-15
 EPA NUMBER PA-1250

SAMPLE LOG

SITE NAME HIGHWAY MATERIALS
PLANT #6 / GENERAL
CRUSHED STONE CO.

TRAFFIC REPORTS			SAMPLE IDENTIFIER	PHASE	SAMPLE DESCRIPTION	SAMPLE LOCATION	TARGET USE	pH	FIELD MEASUREMENTS
Organic	Inorganic	High Hazard							
CN 517	MCN 496	-	AQ - BLANK	AQ	BLANK ~ ORGANIC ~ HPLC INORGANIC ~ distilled water & deionized water			HPLC → 4.80	HPLC → 204 µS/cm
CN 396	MCN 497	-	Sd-1	SOL	STREAM SEDIMENT FROM VALLEY CREEK UPSTREAM. MED. BROWN SILTY - SAND, SOME ORGANICS.	200' UPSTREAM OF NPDES OUTFALL.	STREAM IS USED FOR RECREATIONAL FISHING.		
CN 397	MCN 498	-	Sd-2	SOL	STREAM SEDIMENT. FROM VALLEY CREEK. DOWNSTREAM. BROWN SILTY - SAND W/ MUSTY ODOR.	110' DOWNSTREAM OF NPDES OUTFALL.	STREAM IS USED FOR RECREATIONAL FISHING.		
CN 398	MCN 499	-	Sd-3	SOL	LAGOON SEDIMENT. VERY FINE GRAINED GREY CLAY MATERIAL.	LOCATED IN SETTLING POND #1, IN SOUTH EAST CORNER OF SITE.	ACCESSABLE TO WORKERS.		
CN 399	MCN 500	-	S-1	SOL	SURFACE SOIL SAMPLE FROM ACCESS ROAD LEADING INTO TOP OF QUARRY. GRAYISH - BROWN CLAY MATERIAL. PLASTIC TEXT.	LOCATED AT TOP OF QUARRY BETWEEN TWO CONCRETE BARRIERS.	ACCESSABLE TO WORKERS.		
CN 400	MCQ 994	-	S-2	SOL	SURFACE SOIL SAMPLE FROM ACCESS ROAD IN QUARRY. CRUSTY WHITE SOIL.	LOCATED ON SWITCH- BACK OF QUARRY/ROAD.	ACCESSABLE TO WORKERS.		
CN 401	MCQ 995	-	S-3	SOL	SURFACE SOIL SAMPLE FROM ACCESS ROAD. GREY FINE GRAINED SOIL WITH CLAYLIKE CONSISTENCY.	LOCATED ON QUARRY ACCESS ROAD, BOTTOM TER # 1250 FROM SWITCHBACK.	ACCESSABLE TO WORKERS.		
CN 787	MCQ 996	-	S-4	SOL	DUPLICATE OF S-1 SURFACE SOIL SAMPLE FROM TOP OF QUARRY ACCESS ROAD. GREY - BROWN CLAY.	LOCATED ON QUARRY ROAD AT TOP OF QUARRY BETWEEN TWO CONCRETE BARRIERS.	ACCESSABLE TO WORKERS		
CN 788	MCQ 997	-	S-BACK	SOL	BACKGROUND SOIL SAMPLE. ORANGE - BROWN MED GRAINED SANDY SOIL.	TAKEN FROM WEST SIDE OF PARKING LOT ACROSS QUARRY ROAD FROM GENERAL CRUSHED STONE OFFICE.	ACCESSABLE TO GENERAL POPULATION AND WORKERS.		

ORIGINAL
- (Red)

**ORIGINAL
(Red)**

CONTROL NO:

DATE:

8/22/88

TIME:

2:45

DISTRIBUTION:

HMP #6

BETWEEN:

BARBARA BISH

OF:

PADER
NORRISTOWN

PHONE:

(215) 1900

AND:

RICHARD POMEROY

DISCUSSION:

I REQUESTED AN APPOINTMENT TO REVIEW THE FILE ON HIGHWAY MATERIALS PLANT #6 IN DOWNINGTOWN, PA-1250. SHE COULD NOT FIND THE FILE BUT SHE DID RESERVE ME AN APPOINTMENT FOR 8:00 AM - 12:00 NOON ON SEPT. 21, 1988. SHE SAID SHE WOULD CALL ME BACK WHEN SHE LOCATED THE FILE.

Richard Pomeroy 8/22/88

ACTION ITEMS:

CONTROL NO:

DATE:

8/19/88

TIME:

3:15 PM

DISTRIBUTION:

HIGHWAY MATERIALS PLANT #6

BETWEEN:

JON REEDY

OF:

G.C.S.CO

PHONE:

(215) 253-4271

AND:

RICHARD POMEROY

DISCUSSION:

I CALLED MR. REEDY CONCERNING SITE SECURITY, PARTICULARLY ABOUT PERIMETER FENCES, ETC. MR. REEDY STATED THAT ACCESS ROADS OFF QUARRY ROAD HAVE GATES. THE PERIMETER IS NOT FENCED, HOWEVER THE SITE IS SURROUNDED BY LARGE BERMS OF NATIVE SOIL TO REDUCE AUDIAL & VISUAL IMPACT OF THE PLANT ON THE SURROUNDING NEIGHBORHOOD.

ACTION ITEMS:

8807-15-33

NUS CORPORATION AND SUBSIDIARIES

~~8807-15-32~~ TELEPHONE NOTE
 ORIGINAL 6-88
 (Red)

CONTROL NO:

DATE:

8/12/88

TIME:

0720 HRS

DISTRIBUTION:

HIGHWAY MATERIALS PLANT #6.

BETWEEN:

(TERRY'S SECRETARY)

OF:

PHONE:

SMD REG III CONTROLLER

USEPA

(763) 557-2490

AND:

Richard Pomeroy

DISCUSSION:

I CALLED IN SAMPLE SHIPMENT:

REGION III

DATE SHIPPED 8/11/88

CASE # 10138

10 AQUEOUS & 8 SOLID SAMPLES SHIPPED TO
 CHEMTECH CONSULTING FOR INORGANIC ANALYSES
 VIA PEREX # 5558758634.

10 AQUEOUS & 8 SOLID PLUS 1 SOL. FIELD
 BLANK (VQA ONLY) TO COMPLEMENT LABORATORIES
 FOR ORGANIC ANALYSIS VIA PEREX AIRBILL
 # 5558758623.

Richard Pomeroy

ACTION ITEMS:

8/12/88

CONTROL NO:

DATE:

8/5/88

TIME:

3:35 PM

DISTRIBUTION:

HIGHWAY MATERIALS PLANT #6 /
GENERAL CRUSHED STONE

BETWEEN:

VICTOR
MESSINA

OF:

LEHIGH
VALLEY
ANALYTICS

PHONE:

()

AND:

Richard Pomeroy

DISCUSSION:

MR. MESSINA WAS REFERRED TO
ME BY JON REEDY OF GENERAL
CRUSHED STONE CO. MR. MESSINA
WANTED TO KNOW BOTTLEWARE QUANTITIES
SO HE COULD SUPPLY MR. REEDY'S COMPANY
WITH SUFFICIENT BOTTLEWARE TO GET
SPLIT SAMPLES:

(11 sets AQUEOUS)	(9 sets SOLID)
44 x 1L GLASS AMBER	18 x 40ml VOA
22 x 40ml VOA's	18 x 8oz glass jar
22 x 1L polys	

LEHIGH VALLEY ANALYTICS WILL BE
HANDLING G.C.S.C.'S OWN SAMPLES.

ACTION ITEMS:

Richard Pomeroy 8/5/88

CONTROL NO:

DATE:

8/5/88

TIME:

1:55 PM

DISTRIBUTION:

HIGHWAY MATERIALS PLANT #6 /
GENERAL CRUSHED STONE

BETWEEN:

OF: GENERAL
CRUSHED STONE CO.
(GCSL)

PHONE:

JOHN REEDY

2157253-4271

AND:

RICHARD POMEROY

DISCUSSION:

MR. REEDY CALLED ME FOR SOME
CLARIFICATIONS ON OUR BOTTLEWARE
AND TESTING PROCEDURES. I ANSWERED
HIS QUESTIONS AS BEST AS I COULD AND
REFERRED HIM TO ERIC BLISCHKE OF OUR
CHEMISTRY SECTION.

I ALSO REQUESTED PERMISSION TO
DISPOSE OF OUR DECON WATER ON SITE
WHICH HE GRANTED.

Richard Pomeroy 8/5/88

ACTION ITEMS:



999 WEST VALLEY ROAD
WAYNE, PENNSYLVANIA 19087
215-687-9510

**ORIGINAL
(Red)**

August 3, 1988
C-585-8-8-8
68-01-7346

Mr. Jon Reedy
General Crushed Stone Company
P.O. Box 231
Easton, Pennsylvania 18042

Subject: Sample Locations and Bottleware Requirements
TDD No. F3-8807-15
Highway Materials Plant No. 6/General Crushed Stone
Downingtown, Chester County, Pennsylvania

Dear Mr. Reedy:

This letter is in response to your discussions with Richard Pomeroy and Paul Dietrich, of this office, on July 22, 1988 and July 28, 1988, respectively. Attached please find a proposed sample location map.

Please note that, in addition to the sample locations indicated on the sketch, NUS FIT 3 will take up to three soil samples from the site access roads and up to three aqueous groundwater samples from area home wells.

The total number of samples to be obtained is nine aqueous (surface and groundwater) and six solid (soils and sediments), not including duplicates, blanks, and a background soil sample. The sample bottleware requirements are as follows:

AQUEOUS SAMPLES

<u>Container Type</u>	<u>Number of Containers</u>	<u>Analysis Fraction</u>
40-ml vials	2	Volatile organics
1-liter poly	2	One spiked with HNO ₃ for metals, and one spiked with N ₂ O ₄ for cyanide
1-liter glass amber	4	Extractables (i.e., pesticides, polychlorinated biphenyl, and base-neutral a.c.f.)

Mr. Jon Reedy
General Crushed Stone Company
Page 2 - August 3, 1988

**ORIGINAL
(Red)**

SOLID SAMPLES

<u>Container Type</u>	<u>Number of Containers</u>	<u>Analysis Fraction</u>
40-ml vials	2	Volatile organics
8-ounce glass	2	One for extractables (i.e., pesticides, poly-chlorinated biphenyl, and base-neutral acid) and one for inorganic (i.e., metals and cyanide)

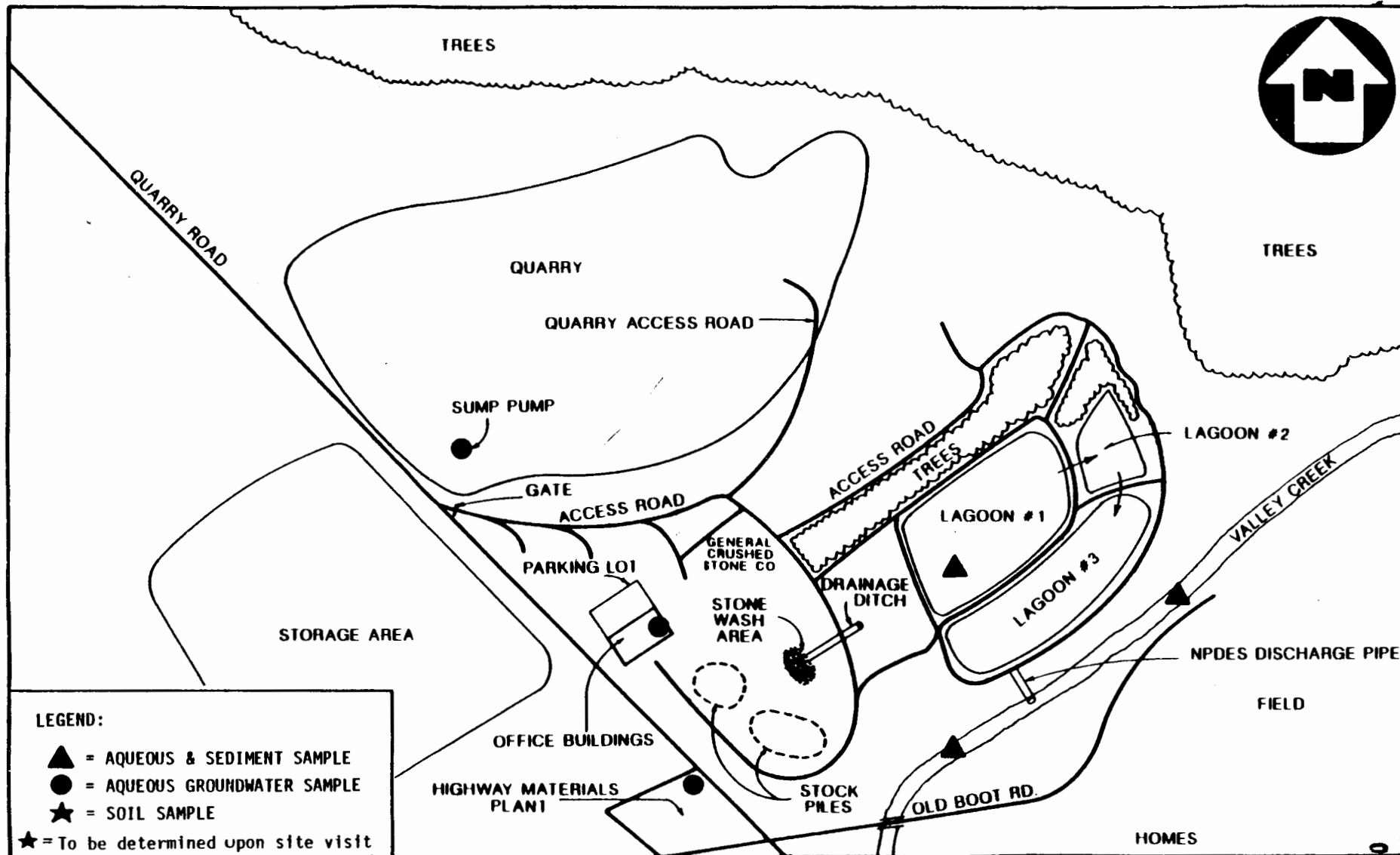
If there are any questions, please do not hesitate to contact Mr. Pomeroy, Paul Dietrich, or Thomas Fromm.

Respectfully,

Garth Glenn
Garth Glenn *for*
Regional Operations Manager,
FIT 3

GG/nmd

Attachment



PROPOSED SAMPLE LOCATION MAP
HIGHWAY MATERIALS PLANT #6
 (NO SCALE)

CONTROL NO:	DATE: 8/2/88	TIME: 10:55 ^{ORIGINAL} (Red)
DISTRIBUTION: HIGHWAY MATERIALS PLANT #6 (HMP #6)		
BETWEEN: PAUL RALETTE	OF: US EPA	PHONE: 215597-1073
AND: RICHARD POMEROY		
DISCUSSION: I CALLED PAUL RALETTE AND ASKED HIM IF IT WAS ACCEPTABLE IF I SEND THE SITE REPRESENTATIVE OF HMP#6 PROPERTY OWNER, MR. JON REEDY, A COPY OF OUR SAMPLE LOCATION MAP AND NUS FITS' BOTTLEWARE REQUIREMENTS SO THEY CAN OBTAIN SPLITS OF OUR SAMPLES. PAUL RALETTE SAID IT WOULD BE NO PROBLEM. EPA IS NOTIFIED AND HAS GRANTED PERMISSION. Richard Pomeroy 8/2/88		
ACTION ITEMS:		

NUS CORPORATION AND SUBSIDIARIES

8807-15-29 TELECON NOTE

CONTROL NO:

DATE:

TIME: RJP 8/2/88

ORIGINAL

(RJP)

8/2/88 10:05 AM

2 AUGUST 1988

8/2/88

DISTRIBUTION:

HIGHWAY MATERIALS PLANT #6
(HMP#6)

BETWEEN:

OF: GENERAL
CRUSHED
STONE CO.

PHONE:

JON REEDY

(215) 253-4271

AND:

RICHARD POMEROY

DISCUSSION:

JON REEDY CALLED TO CONFIRM
MEETING TIME FOR 11 AUGUST 1988
SITE INSPECTION FOR H.M.P. #6 SITE. I
SAID IT WOULD BE 9:00 AM. I ALSO
TOLD MR. REEDY THAT A LETTER WITH
SAMPLING LOCATIONS & BOTTLEWARE REQUIREMENTS
WAS BEING MAILED TODAY.

Richard Pomeroy 8/2/88

ACTION ITEMS:

CONTROL NO:

DATE:

8/1/88

TIME:

3:15 PM

DISTRIBUTION:

HIGHWAY MATERIALS PLANT #6
(HMP #6)

2/26/88
(Red)

BETWEEN:

GARY MOULDER

OF:

PA DER

PHONE:

(215) 378-4175

AND:

Richard Pomeroy

DISCUSSION:

MR. MOULDER RETURNED MY CALL OF EARLIER TODAY. I INFORMED HIM THE THE DATE OF THE SITE INSPECTION ON HMP #6^{SITE} WAS POSTPONED FROM 2 AUGUST 1988 TO 11 AUGUST 1988 @ 9:00 AM. MR. MOULDER STATED THAT HE WOULD MEET WITH FIT3 AT THE SITE. I ALSO ASKED MR. MOULDER WHO I SHOULD CONTACT TO OBTAIN FILE ACCESS ON SAMPLES TAKEN BY PADER ON THE SITE. HE RECOMMENDED CALLING BARBARA BISH AT THE NOTRISTOWN PADER BRANCH OFFICE (215) 270-1900.

Richard Pomeroy 8/1/88

ACTION ITEMS:

CONTROL NO:

DATE:

7/29/88

TIME:

10:05 AM

ORIGINAL
(Red)

DISTRIBUTION:

HIGHWAY MATERIALS PLANT #6

BETWEEN:

PAUL RAUETTE

OF:

U.S. EPA

PHONE:

(215) 597-1073

AND:

RICHARD POMEROY

DISCUSSION:

I SPOKE TO MR. RAUETTE AND INFORMED HIM THAT THE DATE OF FIELD WORK FOR THE S.I. FOR THE HIGHWAY MATERIALS PLANT #6 IN DOWNINGTOWN WAS MOVED FROM 2 AUGUST 1988 TO 11 AUGUST 1988. HE SAID HE WOULD CALL TO DISCUSS THE SAMPLING PLAN LATER TODAY OR MONDAY.

Richard Pomroy 7/29/88

ACTION ITEMS:

CONTROL NO:

DATE:

7/28/88

TIME:

15:20

DISTRIBUTION:

ORIGINAL
(Red)

BETWEEN:

Mr. Jon Reedy

OF:

General Crushed
Stone

PHONE:

(215) 253-4271

AND:

Paul Dietrich

DISCUSSION:

Mr. Reedy requested that the site inspection be rescheduled from August 2 to August 11, Thursday. I concurred with the change in schedule.

Also, Mr. Reedy stated that he would like a map of our proposed sample location. Additionally, information regarding our bottlenecks requirements volume, etc. I stated that Mr. Pomeroy would mail this info ASAP.

Paul Dietrich 7/28/88

ACTION ITEMS:

8807-15-23

NUS CORPORATION AND SUBSIDIARIES

TELECON NOTE

CONTROL NO:

DATE:

7/26/88

TIME:

3:20 PM

DISTRIBUTION:

ORIGINAL
(Red)

HIGHWAY MATERIALS PLANT #6
AKA GENERAL CRUSHED STONE

BETWEEN:

OF:

PHONE:

GARY MOULDER

PA DER

6215378-4175

AND:

RICHARD POMEROY

DISCUSSION:

I INFORMED MR. MOULDER THAT
NUS FIT 3 WOULD BE CONDUCTING A
SITE INSPECTION ON THE HIGHWAY
MATERIALS PLANT #6 ON TUESDAY,
AUGUST 2ND 1988 @ 9:00 AM.

MR. MOULDER STATED HE WOULD NOT JOIN
FIT 3 DUE TO PREVIOUS ENGAGEMENT.
I LEFT HIM MY NAME & NUMBER
IN THE EVENT HE HAD FURTHER
QUESTIONS.

Richard Pomeroy 7/26/88

ACTION ITEMS:

8807-15-22

NUS CORPORATION AND SUBSIDIARIES

TELECON NOTE

CONTROL NO:

DATE:

7/22/88

TIME:

3:05 AM

DISTRIBUTION:

HIGHWAY MATERIALS
PLANT #8

ORIGINAL
(Red)

BETWEEN:

JOHN REEDY

OF:

GENERAL
CRUSHED
STONE CO.

PHONE:

(215) 253-4271

AND:

Richard Pomeroy

DISCUSSION:

JOHN REEDY CALLED TO INFORM ME
HE RECEIVED MY LETTER OF INTRODUCTION &
REQUEST FOR SITE ACCESS. HE CONFIRMED
OUR MEETING ON SITE FOR AUGUST 2ND 1988
@ 9:00 AM.

TENTATIVE MEETING FIT # ON SITE
WILL BE:

JOHN REEDY (ASST. SAFETY DIRECTOR)
EUGENE WEBSTER (PLANT MANAGER)
TONY DEMASSI (OPERATIONS MANAGER)

THE PLANT PHONE # IS (215) 269-1710.
HE REPEATED HIS REQUEST FOR SAMPLING
INFORMATION AND I TOLD HIM I WOULD

ACTION ITEMS:

SEND A COPY OF THE SAMPLE LOCATION
MAP.

Richard Pomeroy 7/22/88



999 WEST VALLEY ROAD
WAYNE, PENNSYLVANIA 19087
215-687-9510

ORIGINAL
(Red)

July 18, 1988
C-585-7-8-37
68-01-7346

Mr. Jon Reedy
General Crushed Stone Company
P.O. Box 231
Easton, Pennsylvania 18042

Subject: Request for Site Access
TDD No. F3-8807-15
Highway Materials Plant No. 6/General Crushed Stone
Downingtown, Chester County, Pennsylvania

Dear Mr. Reedy:

In response to your discussion with Richard Pomeroy, of this office, on July 15, 1988. NUS Corporation is under Contract No. 68-01-7346 to provide technical and management services to the United States Environmental Protection Agency (EPA) in support of investigative activities at selected uncontrolled hazardous substance disposal sites. In this support capacity, we have received a work assignment to perform a site inspection as outlined below.

Please consider this a formal request for obtaining site access for August 2, 1988 to the General Crushed Stone property in Downingtown, Pennsylvania. The purpose of this request is to conduct a site inspection of the property in order to assess the need for further action by EPA. Work to be performed at the property consists of sampling groundwater, surface water, and soils.

The statutory basis for this inspection is contained in the attached Letter of Introduction, provided by EPA for the project team leader, Richard Pomeroy. If there are any questions, please do not hesitate to contact Mr. Pomeroy, Paul Dietrich, or Thomas Fromm.

Respectfully,

A handwritten signature in dark ink, appearing to read "Garth Glenn", is written over the typed name.

Garth Glenn
Regional Operations Manager,
FIT 3

GG/nmd

Attachment

8807-15-20

NUS CORPORATION AND SUBSIDIARIES

TELECON NOTE

CONTROL NO:

DATE:

7/15/88

TIME:

1420 HRS

DISTRIBUTION:

HIGHWAY MATERIALS PLANT #6

ORIGINAL
(Red)

BETWEEN:

JON
JOHN REEDY

OF:

GENERAL
CRUSHER
STONE

PHONE:

(215) 253-4271

AND:

RICHARD POMEROY

(G.C.S.)

DISCUSSION:

MR. REEDY RETURNED MY CALL.

I REQUESTED SITE ACCESS FOR A FULL SAMPLING SITE INSPECTION ON TUESDAY AUGUST 2ND, 1988 AT 9:00 AM WHICH WAS GRANTED BY MR. JON REEDY.

WE WILL BE ACCOMPANIED BY MR. VERNON SNYDER OF G.C.S. AND /OR JEAN WEBSTER OF THE SAME. MR REEDY REQUESTED A LETTER OF INTRODUCTION WHICH I SAID I WOULD SEND. I OFFERED SPLIT SAMPLES WHICH HE TENTATIVELY DECLINED, BUT HE REQUESTED INFORMATION REQUESTING THE LOCATION OF THE SAMPLES. I OFFERED TO FURNISH HIM WITH A COPY OF OUR SAMPLING PLAN ONCE IT

ACTION ITEMS:

WAS APPROVED BY EPA WHICH HE ACCEPTED.

Richard J. Pomroy

8807-15-21

NUS CORPORATION AND SUBSIDIARIES

TELECON NOTE

CONTROL NO:

DATE:

7/15/88

TIME:

1050 AM

ORIGINAL

(Red)

DISTRIBUTION:

HIGHWAY MATERIALS PLANT #6

BETWEEN:

SECRETARY

OF:

GENERAL
CRUSHED
STONE

PHONE:

(215) 253-4271

AND:

Richard Pomeroy

G.C.S.)

DISCUSSION:

CALLED FOR MR. JOHN REEDY
 OF GENERAL CRUSHED STONE TO
 OBTAIN SITE ACCESS FOR AN S.I.
 ON G.C.S. FOR WEEK OF 8/1/88.
 MR. REEDY WAS IN A MEETING
 AND WAS UNAVAILABLE. I LEFT MY
 NAME AND NUMBER AND WAS TOLD
 HE WOULD RETURN HIS CALL.

Richard Pomeroy

7/15/88

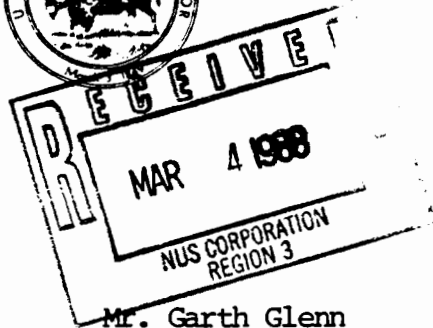
ACTION ITEMS:

8807-15-19



United States Department of the Interior

FISH AND WILDLIFE SERVICE

ORIGINAL
(Red)

Suite 322
315 South Allen Street
State College, Pennsylvania 16801

March 2, 1988

Mr. Garth Glenn
Regional Operations Manager
FIT 3
NUS Corporation
999 West Valley Road
Wayne, PA 19087

Dear Mr. Glenn:

This responds to your letters of February 8 and 25, 1988, requesting information on endangered or threatened species within the areas affected by the following uncontrolled hazardous substance sites:

<u>Site</u>	<u>County</u>
J.C. Cleaners	Adams
Sterling Borax	Beaver
F.R. & S. No. 3 Industrial Waste Site	Berks
Eppinger and Russell Co.	Bucks
Highway Materials Plant #6	Chester
Struthers Wells/Ernst Steel	Crawford
Claremont Drive	Cumberland
Tri-State Pagan Road	Erie
Meg-Baldwin Flats (Davis Dump)	Erie
City of Erie-Millcreek Site	Erie
Itt Grinnell Corp.	Lancaster
Dupont/New Castle Works	Lawrence
Mid Atlantic Coast Delivery	Luzerne
Wayne Junction Railroad	Philadelphia
Umbria St. Ash Disposal (5 & 6)	Philadelphia
Quarry Ash Disposal (7 & 8)	Philadelphia
Lawrence Township Landfill	Tioga
Haines Landfill	York

Two federally listed endangered birds are expected to be found as transient species in the project area. They are the bald eagle (Haliaeetus leucocephalus) and peregrine falcon (Falco peregrinus). There is no listed critical habitat for these species in the project area.

We have no information to indicate that any endangered species under our jurisdiction reside within a radius of three miles of the project site. Therefore, no Biological Assessment or further Section 7 consultation under the Endangered Species Act (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.) is required with the Fish and Wildlife Service. Should project plans change,

or if additional information on listed or proposed species becomes available, this determination may be reconsidered. A compilation of federally listed endangered and threatened species in Pennsylvania is enclosed for your information.

The State of Pennsylvania has classified certain species as threatened or endangered. We suggest that you contact the Pennsylvania Fish Commission (fish, reptiles and amphibians), the Pennsylvania Game Commission (wildlife) and the Pennsylvania Department of Environmental Resources (plants) for further information on these species.

Your letter does not contain enough information for us to determine if other resources of concern to the Service are being affected by the sites or proposed actions at the site. Specifically, we are concerned that chemical contaminants on or migrating from uncontrolled hazardous substance disposal sites may have acute or chronic toxicity effects on terrestrial and aquatic life. For example, open waste ponds, leachate seeps, and off-site contamination of streams or other surface waters can represent significant hazards to fish and wildlife resources. Food chain effects of substances that bioaccumulate or biomagnify increase these hazards.

On sites where chemical contaminants are or could be released to significant terrestrial wildlife habitat, wetlands, or surface waters, we recommend that biological studies be incorporated into your evaluation of the sites. For example, an indication of the bioavailability of contaminants released into surface waters can be obtained relatively easily by collecting two composite fish samples. We would be happy to review and comment on plans for proposed fish and wildlife studies.

This response relates only to endangered or threatened species under our jurisdiction, based on an office review of the proposed project's location. No field inspection of the project area has been conducted by this office. Consequently, this letter is not to be construed as addressing other Service concerns under the Fish and Wildlife Coordination Act or other legislation.

Please contact us if we can be of further assistance.

Sincerely,



Charles J. Kulp
Supervisor

Enclosure

FEDERALLY LISTED ENDANGERED AND THREATENED SPECIES
IN PENNSYLVANIA

ORIGINAL
(Red)

COMMON NAME	SCIENTIFIC NAME	STATUS	DISTRIBUTION
<u>FISHES:</u>			
Sturgeon, shortnose*	<u>Acipenser brevirostrum</u>	E	Delaware River and Other Atlantic Coastal waters
<u>REPTILES:</u>			
NONE			
<u>BIRDS:</u>			
Eagle, bald	<u>Haliaeetus leucocephalus</u>	E	Entire State
Falcon, American peregrine	<u>Falco peregrinus anatum</u>	E	Entire State - re-establishment to former breeding range in progress
Falcon, Arctic	<u>Falco peregrinus tundrius</u>	E	Entire State migratory - no nesting
<u>MAMMALS:</u>			
Bat, Indiana	<u>Myotis sodalis</u>	E	Entire State
Cougar, Eastern	<u>Felis concolor cougar</u>	E	Entire State - probably extinct
<u>MOLUSKS:</u>			
NONE			
<u>PLANTS:</u>			
Pogonia, small whorled	<u>Isotria medeoloides</u>	E	Berks, Centre, Chester, Greene, Monroe, Montgomery, Philadelphia & Venango Counties

* Principal responsibility for this species is vested with the National M.A. Fisheries Service.

Region 5 6/3/85 - 1 p.

TDD NUMBER F3-8807-15
 EPA NUMBER PA-1250

SAMPLE LOG

SITE NAME HIGHWAY MATERIALS
PLANT #6 / GENERAL
CRUSHED STONE CO.

TRAFFIC REPORTS			SAMPLE IDENTIFIER	PHASE	SAMPLE DESCRIPTION	SAMPLE LOCATION	TARGET USE	pH	FIELD MEASUREMENTS
Organic	Inorganic	High Hazard							
CN 517	MCN 496	—	AQ-BLANK	AQ	BLANK ~ ORGANIC ~ HPLC WATER INORGANIC ~ distil- led & deionized water			HPLC → 4.80	HPLC → 204 μS/cm
CN 396	MCN 497	—	Sd-1	SOL	STREAM SEDIMENT FROM VALLEY CREEK UPSTREAM. MED. BROWN SILTY- SAND, SOME ORGANICS.	200' UPSTREAM OF NPDES OUTFALL.	STREAM IS USED FOR RECREATIONAL FISHING.		
CN 397	MCN 498	—	Sd-2	SOL	STREAM SEDIMENT. FROM VALLEY CREEK. DOWNSTREAM. BROWN SILTY-SAND W/MUSTY ODOR.	110' DOWNSTREAM OF NPDES OUTFALL.	STREAM IS USED FOR RECREATIONAL FISHING.		
CN 398	MCN 499	—	Sd-3	SOL	LAGOON SEDIMENT. VERY FINE GRAINED GREY CLAY MATERIAL.	LOCATED IN SETTLING POND #1, IN SOUTH EAST CORNER OF SITE	ACCESSABLE TO WORKERS.		
CN 399	MCN 500	—	S-1	SOL	SURFACE SOIL SAMPLE FROM ACCESS ROAD LEADING INTO TOP OF QUARRY. GRAVEL - BROWN CLAY MATERIAL. PARTICULATE.	LOCATED AT TOP OF QUARRY BETWEEN TWO CONCRETE BARRIERS.	ACCESSABLE TO WORKERS.		
CN 400	MCQ 994	—	S-2	SOL	SURFACE SOIL SAMPLE FROM ACCESS ROAD IN QUARRY. CRUSTY WHITE SOIL.	LOCATED ON SWITCH- BACK OF QUARRY/ROAD.	ACCESSABLE TO WORKERS.		
CN 401	MCQ 995	—	S-3	SOL	SURFACE SOIL SAMPLE FROM ACCESS ROAD. GREY FINE GRAINED SOIL WITH CLAYLIKE CONSISTENCY.	LOCATED ON QUARRY ACCESS ROAD, BOTTOM TIER ~ 1250' FROM SWITCHBACK.	ACCESSABLE TO WORKERS.		
CN 787	MCQ 996	—	S-4	SOL	DUPLICATE OF S-1 SURFACE SOIL SAMPLE FROM TOP OF QUARRY/ ACCESS ROAD. GREY- BROWN CLAY.	LOCATED ON QUARRY ROAD AT TOP OF QUARRY BETWEEN TWO CONCRETE BARRIERS.	ACCESSABLE TO WORKERS.		
CN 788	MCQ 997	—	S-BACK	SOL	BACKGROUND SOIL SAMPLE. ORANGE - BROWN MED GRAINED SANDY SOIL.	TAKEN FROM WEST SIDE OF PARKING LOT ACCESS QUARRY ROAD FROM GENERAL CRUSHED STONE OFFICE.	ACCESSABLE TO GENERAL POPULATION AND WORKERS.		

10/1/01
 10/1/01

SAMPLE LOG

TDD NUMBER E3-8807-15

EPA NUMBER DA - 1250

SITE NAME HIGHWAY MATERIALS

PLANT # 6 / GENERAL

CRUSHED STONE CO.

[illegible]

ORIGINAL
(Red)

CONTROL NO:

DATE:

5-16-88

TIME:

1130 hrs

DISTRIBUTION:

Re: Liquid waste stream

ORIGINAL
(Red)

BETWEEN:

Secretary of

OF:

Matthey Bishop,
INC

PHONE:

(215) 971-3004

AND:

Janis Hollinger

NUS

DISCUSSION:

I asked to speak to MARK Miller, however, he was in a meeting. I left a message for him to call me regarding The National Liquid Waste Company.

ACTION ITEMS:

Janis Hollinger
5-16-88

CONTROL NO:

DATE:

5-6-88

TIME:

0815 ^{hmt}
ORIGINAL
(Red)

DISTRIBUTION:

Re: DER sample analysis results.

BETWEEN:

Jon Reedy

OF: General Crushed
Stone

PHONE:

(215) 253-4271

AND:

Janis Hollinger

NUS

DISCUSSION:

Jon called ^{JH} me to ~~ask~~ ^{JH} if to tell me he had obtained a copy of the report and said I did a good job with it. He also wanted to know if he could get a copy of the ~~private~~ ^{JH} testing results from Highway Materials plant #6 private mill by PADOT. The results are in the Norris-town office. I said I would let him know.

ACTION ITEMS:

Janis Hollinger

5-6-88

CONTROL NO:

DATE:

5-4-88

TIME:

0930 hrs

DISTRIBUTION:

ORIGINAL
(Red)

Re: S.I. for Highway Materials Plant No 6.

BETWEEN:

Paul Racette

OF:

SIO-EPA

PHONE:

(215) 597-1073

AND:

Janis Hollinger

NUS

DISCUSSION:

Regarding the Highway Materials Plant #6 - check
file for DER sampling results - then call + follow up if not
here. Call Paul Back + let him know what's up, so he can
decide whether to sample or not.

Janis Hollinger
5-4-88

ACTION ITEMS:

ORIGINAL
(red)

R-585-2-8-39

NON-SAMPLING SITE RECONNAISSANCE SUMMARY REPORT
HIGHWAY MATERIALS PLANT NO. 6
PREPARED UNDER

TDD NO. F3-8712-16
EPA NO. PA-1250
CONTRACT NO. 68-01-7346

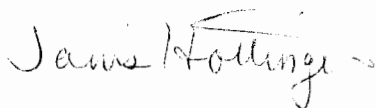
FOR THE

HAZARDOUS SITE CONTROL DIVISION
U.S. ENVIRONMENTAL PROTECTION AGENCY

MARCH 8, 1988

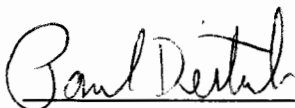
NUS CORPORATION
SUPERFUND DIVISION

SUBMITTED BY



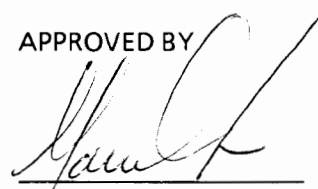
JANIS HOTTINGER
ENVIRONMENTAL SCIENTIST

REVIEWED BY



PAUL DIETRICH
ENVIRONMENTAL SCIENTIST

APPROVED BY



GARTH GLENN
REG. OPERATIONS
MANAGER, FIT 3

ORIGINAL
(Red)

Scope of Work

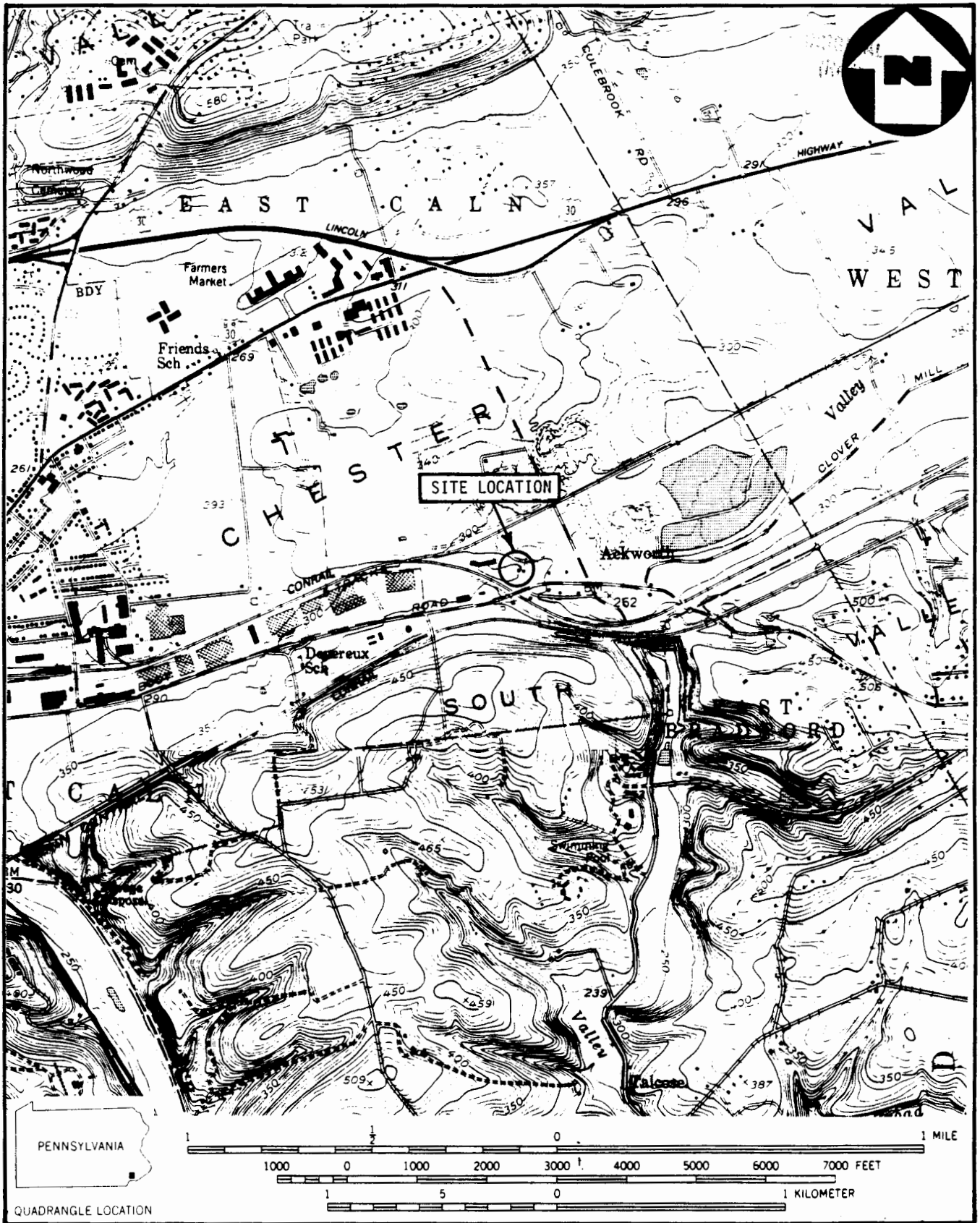
NUS FIT 3 was tasked to conduct a non-sampling site reconnaissance of the Highway Materials Plant No. 6 (HMP No. 6) and the General Crushed Stone Company (GCSC), located outside of Downingtown, in East Caln Township, Chester County, Pennsylvania.

Background Information

HMP No. 6 (also called the Ackworth Plant) is located at the northwestern corner of the Boot and Quarry Roads intersection, East Caln Township, Chester County, Pennsylvania (see figure 1, page 2). HMP No. 6 leased 5 acres of land from Bradford Hill Quarries from 1953 until 1967, when GCSC purchased the quarry and its 293 acres of adjoining property (see figure 2, page 3). HMP No. 6 now leases the property from GCSC. Since 1953, HMP No. 6 has manufactured road paving asphalt, which is produced by mixing asphalt, limestone, and limestone fines. A wet air emission control scrubber was used prior to 1962 as a waste control measure. Solid waste was separated from liquid waste via inground concrete setting ponds (liquids were reused). The settling ponds were used until 1962, when a baghouse was installed for air emission control. The settling ponds were backfilled. The dust collected from the baghouse was reintroduced into the product and is sold to farmers as limestone or is sent to the Highway Materials Perkiomenville Plant to use in manufacturing asphalt.

HMP No. 6 uses 1,1,1-trichloroethane in chemical analyses to determine the percentage of asphalt in their product. One 55-gallon steel drum of clean solvent and one similar drum of waste solvent were on site during the FIT 3 visit. According to William Smith, safety director for the HMP No. 6, one to 1-1/2 drums of solvent are used annually.

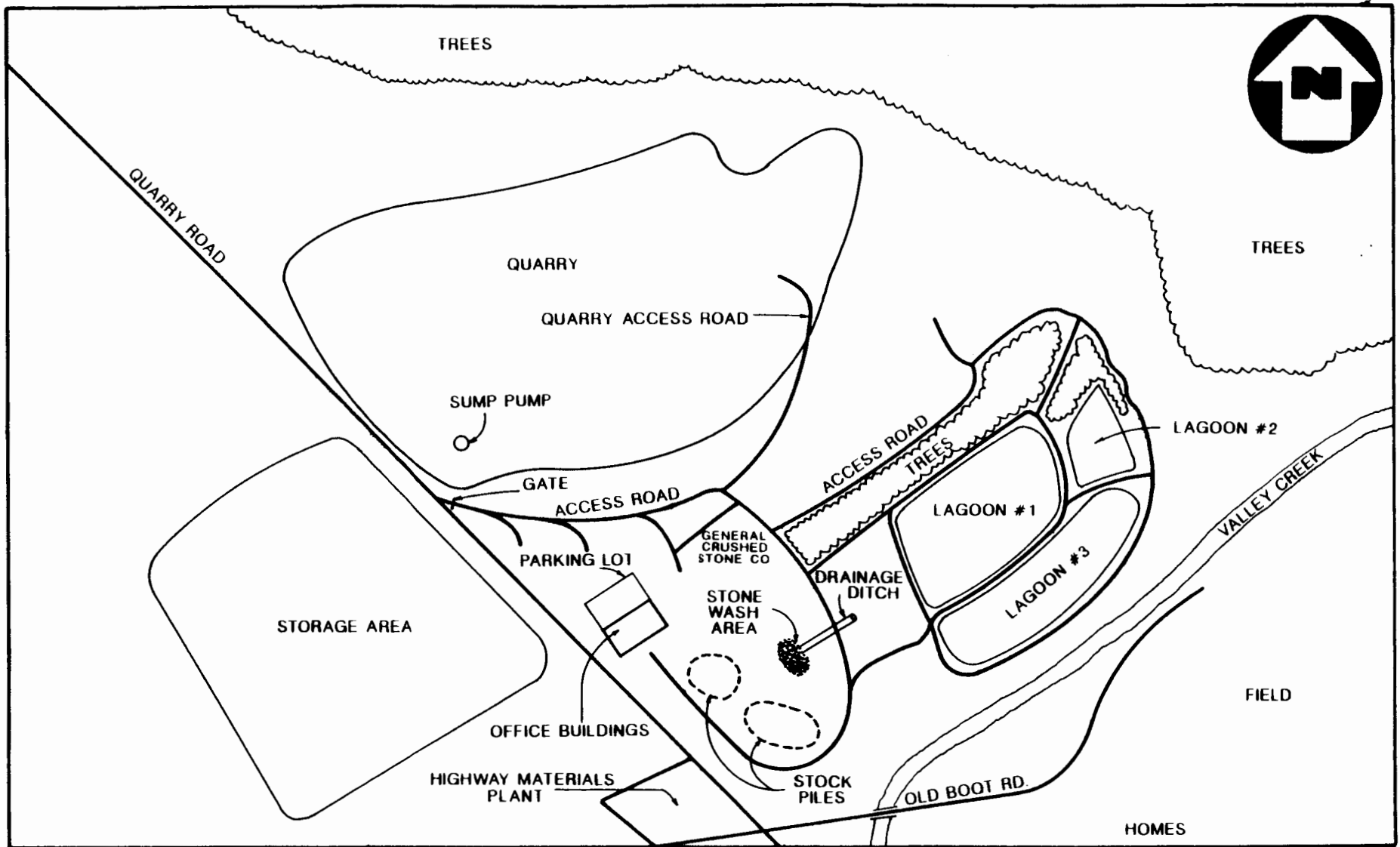
All solvent wastes are removed by Advanced Environmental Technology Corporation, of Flanders, New Jersey, or by Environmental Control System, Incorporated. These wastes are sent to a transport, storage, and disposal facility in Flanders, New Jersey or to Spectron, Incorporated, in Elkton, Maryland. The last shipment of waste 1,1,1-trichloroethane was removed on January 27, 1988. Clean 1,1,1-trichloroethane is purchased from the Union Chemical Company in Conshohocken, Pennsylvania.



SOURCE: (7.5 MINUTE SERIES) U.S.G.S DOWNINGTON & UNIONVILLE, PA., QUADS.

SITE LOCATION MAP
HIGHWAY MATERIALS PLANT #6
 SCALE 1: 24000





SITE SKETCH
HIGHWAY MATERIALS PLANT #6
 (NO SCALE)

FIGURE 2



Another waste produced at the HMP No. 6 is used motor oil. It is stored in tanks and disposed by the Total Recovery Waste Oil Removal Services, of Malvern, Pennsylvania. Until two years ago, the facility used no. 2 heating oil (a light-weight oil) to fuel the asphalt manufacturing process. The company now uses propane. The propane is stored in a tank on the property.

According to William Smith, there has never been an accidental solvent, waste motor oil, or fuel oil spill. The facility is classified as a small generator of hazardous waste (identification no. PAD002335156). The permit became effective in mid-1986.

Prior to RCRA, 1,1,1-trichloroethane and motor oil waste were added to the no. 2 fuel oil burned to fire the drying process in road asphalt production. Approximately 1 gallon of waste 1,1,1-trichloroethane per week was placed in the 10,000-gallon fuel tank. A small, unknown amount of waste motor oil was included. The materials were combusted in the heating chambers of the burner and then released through the wet air emission control scrubber. William Smith stated that the Norristown Branch of the Pennsylvania Department of Environmental Resources (PA DER) was aware of these activities and approved of them.

In October 1979, PA DER became aware, via internal security at Matthey Bishop, Incorporated, that possible illegal activities were occurring concerning Matthey Bishop's waste disposal. Joseph Phillips, of National Liquid Waste (NLW), had a contract with Matthey Bishop, Incorporated, of Devon, Pennsylvania, to pick up and deliver Matthey Bishop's liquid wastes to a Chem-Clear disposal facility. PA DER conducted a surveillance on Joseph Phillips' disposal activities. For two nights, Joseph Phillips delivered the wastes to a Chem-Clear facility. On October 24, 1979, however, Solid Waste Specialist Bruce Beitler observed Mr. Phillips from the time he picked up the liquid waste from Matthey Bishop, Incorporated until the actual dumping of the wastes on the GCSC quarry property. Matthey Bishop, Incorporated did receive waste disposal manifests from Joseph Phillips. The manifests stated that the wastes were taken to Chem-Clear. GCSC had a verbal agreement for Joseph Phillips to apply liquid waste to quarry roads for dust suppression. This practice occurred from approximately 1977 until 1979. The exact constituents of the liquid waste materials are not known.

Information gathered thus far by FIT 3 on the waste stream produced by Matthey Bishop, Incorporated revealed ceramic materials in a waterbase, including alumina oxide, silicates, and some iron. According to Bruce Beitler, these materials are not considered hazardous. However, it is not known whether Joseph Phillips gathered wastes that were generated at different facilities. Mr. Phillips was arrested on October 24, 1979 but was released after he paid a fine.

The areas sprayed for dust suppression by National Liquid Wastes include the road that surrounds the stockpile and continues to within 100 feet of the drainage ditch. Spraying was resumed 100 feet past the ditch and included the quarry access roads, ending 50 feet from the quarry floor, according to Gene Webster, GCSC plant manager. Bruce Beitler stated in his report that he had observed wastes being sprayed on the quarry floor.

A sump pump is designed to pump excess water from the quarry floor to three earthen, lined, holding ponds on the property. The water is reused for washing the stone material or is discharged into Valley Creek under NPDES Permit No. PA0013587. The potential exists for groundwater, surface water, and soil contamination as a result of these activities. Many residents rely on home wells for their potable water source. FIT 3 is awaiting a description from Matthey Bishop, Incorporated of the wastes disposed by Joseph Phillips. Past dust suppressant material used by GCSC included waste motor oil. The company currently uses water from the holding ponds.

HMP No. 6 appears to be handling its waste 1,1,1-trichloroethane adequately. There is the potential for groundwater contamination from the former use of inground concrete dewatering/settling ponds. Asphalt dust collected from the wet scrubber and baghouse was discharged to the ponds in a water slurry. The dust was removed and the water was reused. The ponds were backfilled and a new asphalt plant was built over them.

GCSC has an NPDES permit, as well as a mine drainage permit secured from PA DER. Sampling results were not obtained.

There have been no federal, state, or private remedial actions taken at this site as of this time.

Sampling to Date

According to William Smith, HMP No. 6's safety director, PA DER sampled the facility in 1987. The groundwater table was measured and samples from the on-site wells were taken. Presumably, all Hazard Substances List parameters were tested. The state sampling results are on file in the Norristown Branch office of PA DER. The state has been contacted and the files are to be reviewed in the near future. Mr. Smith stated that the water table was found to be low and the water quality was relatively potable. The plant had sampled the groundwater in the early to mid-1970s. The samples were sent to Valley Forge Laboratories for potability testing. The water was classified as semi-potable. The plant prefers to use bottled water to drink, while using well water for plumbing purposes.

According to Gene Webster, GCSC plant supervisor, in October 1979, PA DER officials Bruce Beitler, Marilyn Hewitt, and Donald Knorr collected liquid samples from the holding tank of Joseph Phillips' truck, the sump pump located on the quarry floor (which was then approximately 200 feet deep), and from off-site private home wells. These results are yet to be reviewed at the Norristown Branch office of PA DER. GCSC had the on-site well sampled and tested. The actual test dates are not available; however, the water was never classified as non-potable, according to Gene Webster; however, bottled water is used for drinking.

Geology Information

HMP No. 6 lies within the Piedmont Upland Section of the Piedmont Physiographic Province. This section is characterized by metamorphic and igneous rocks that have been weathered to form gently rolling hills. More specifically, the site lies within the Chester Valley, which is a lowland underlain by carbonate rocks. Because these carbonate units weathered more rapidly than the surrounding igneous and metamorphic rocks, the valley was formed. The geologic structure of the area consists of a series of extremely complicated anticlines and synclines that generally trend northeast-southwest.^{1,2}

The site is specifically underlain by the Ordovician-Cambrian age Conestoga Formation (60 percent), the Cambrian age Ledger Formation (10 percent), and the Elbrook Formation (30 percent).³

The Conestoga consists of blue to gray, impure, granular, thin-bedded, micaceous limestone. The stratigraphic thickness of the Conestoga Formation exceeds 500 feet.²

The Elbrook Formation stratigraphically underlies the Conestoga Formation and consists of finely laminated, fine-grained, argillaceous marble. The stratigraphic thickness exceeds 300 feet.²

The Ledger Formation stratigraphically underlies the Elbrook Formation and consists of light gray to white crystalline dolomite. The stratigraphic thickness of the Ledger is approximately 600 feet.²

The soil mantling the site is mapped as a composite of moderately eroded Hollinger silt loam (30 percent) and Conestoga silt loam (70 percent). The Hollinger Series consists of thin, well-drained soils. Depth to bedrock is usually less than 20 inches. The pH ranges from 6.0 to 6.4. The Conestoga series consists of deep, well-drained soils. The depth to bedrock is about 60 inches and the pH ranges from 6.0 to 7.0.⁴

Summary of Activities

On January 28, 1988, NUS FIT 3 members Janis Hottinger and Sharon Schaeffer conducted a non-sampling site reconnaissance of HMP No. 6 in Downingtown, East Caln Township, Chester County, Pennsylvania. FIT 3 was accompanied on site by Vernon Snyder, safety director and environmental engineer for GCSC, Jon Reedy, assistant safety director for the GCSC, and William Smith, safety director for the HMP No. 6. Photographs were taken on site (see attachment 1).

Weather conditions were cold and windy, with a temperature in the mid-30s.

Persons Contacted

Prior to Field Trip

Jon Reedy
Assistant Safety Director
GCSC
Easton, PA 18042
(215) 253-4271

Paul Racette
EPA Site Investigation Officer
841 Chestnut Building
Ninth and Chestnut Streets
Philadelphia, PA 19107
(215) 597-1073

David Planinsek
PA DER Solid Waste Specialist
1875 New Hope Street
Norristown, PA 19401
(215) 565-1687

At the Site

Jon Reedy
Assistant Safety Director
GCSC
Easton, PA 18042
(215) 253-4271

Vernon Snyder
Safety Director/Environmental Engineer
GCSC
Easton, PA 18042
(215) 253-4271

Gene Webster
Plant Superintendent
GCSC
Quarry Road Box 152
Downingtown, PA 19335
(215) 269-1710

Anthony DeMassi
Operations Manager
GCSC
Quarry Road Box 152
Downingtown, PA 19335
(215) 269-1710

Site Name: Highway Materials Plant No. 6
TDD No.: F3-8712-16

At the Site (Continued)

William Smith
Safety Director
HMP No. 6
Quarry and Boot Roads
Downingtown, PA 19335
(215) 269-1710

Site Observations

- No HNU readings above the background reading of 0.4 ppm were recorded.
- The mini-alert was set at the X1 position. No readings above the background readings were recorded.
- There were three holding ponds on the GCSC property. They were topographically tiered, with pond no. 1 flowing via underground pipeline to pond no. 2, which then flowed, in a similar manner, to pond no. 3. The ponds had an impoundment freeboard of approximately two or three feet at any given time.
- A drainage ditch, running northeast and southwest, collected excess washwater from the stone washing process and from site surface drainage and diverted it to the holding ponds.
- No monitoring wells were observed on site.
- A fence and locking gates surrounded both HMP No. 6 and GCSC.
- In general, the site slope was varied. The quarry was approximately 250 feet in depth.
- A sump pump was located on the quarry's floor to remove water produced from blasting the bedrock.
- Valley Creek, which flowed south and ran northeast and southwest along Old Boot Road, was identified as a point of potential contamination. This stream was located 200 yards southeast and downgradient of the 3 holding ponds.
- The closest home well to HMP No. 6 was identified across Old Boot Road, approximately 200 yards in a southeastward direction.
- Land use surrounding the property consisted of agricultural land, residences, and woodlands.
- No wetlands or critical habitats were identified during the site visit.

Geology and Groundwater References

1. Pennsylvania Department of Environmental Resources, Bureau of Topographic and Geologic Survey. Physiographic Provinces of Pennsylvania. Map 13, Third Printing, 1979.
2. United States Geological Survey. Groundwater Resources of Chester County, Pennsylvania. September 1977.
3. Pennsylvania Department of Environmental Resources, Bureau of Topographic and Geologic Survey. Atlas of Preliminary Geologic Quadrangle Maps of Pennsylvania. Map 61, 1981.
4. United States Department of Agriculture. Soil Conservation Service. Soil Survey of Chester and Delaware Counties, Pennsylvania. May 1963.
5. United States Geological Survey. Groundwater Levels in the Carbonate Rocks of Central Chester County, Pennsylvania. 1984.

ATTACHMENT 1

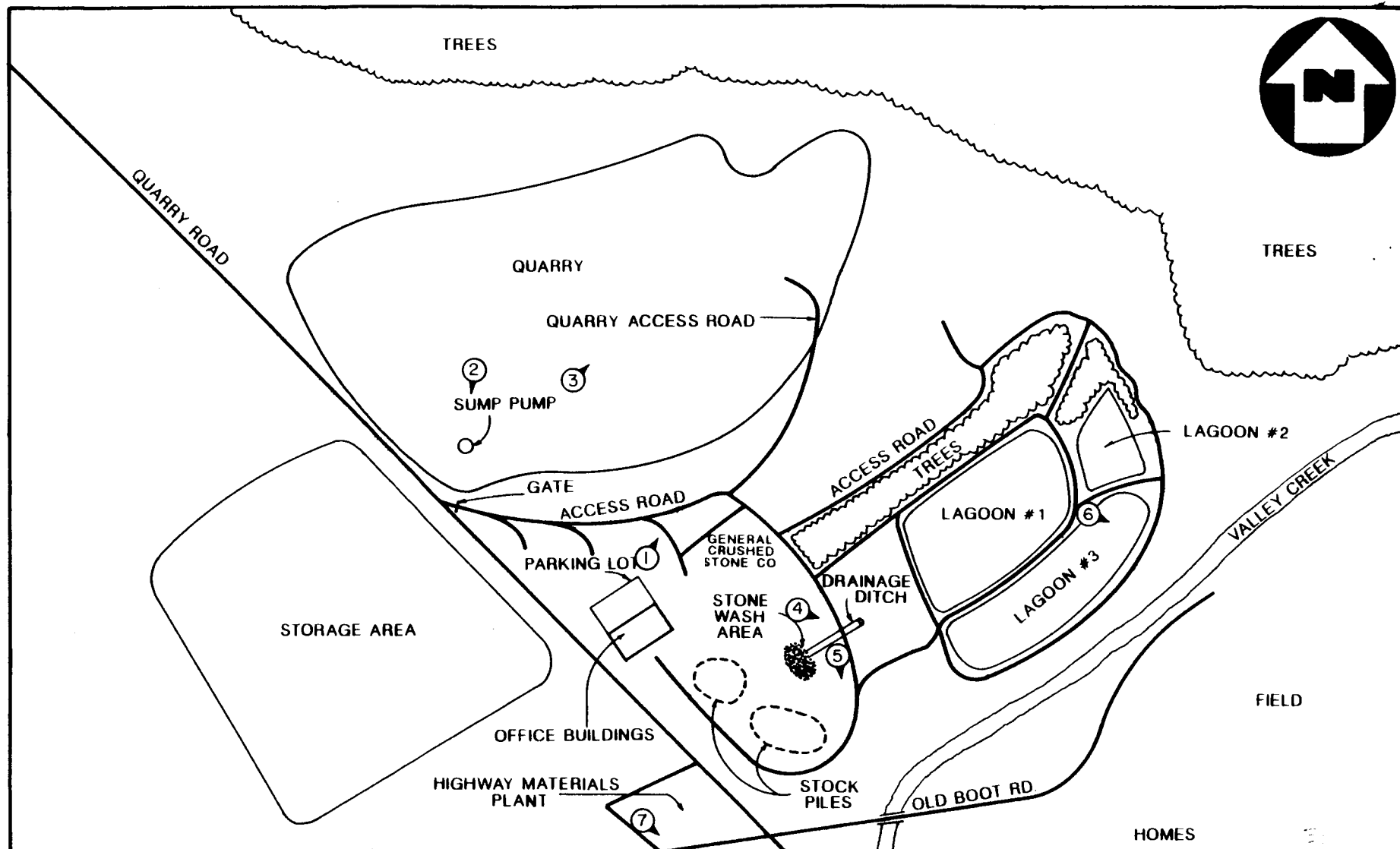


PHOTO LOCATION MAP
HIGHWAY MATERIALS PLANT #6
(NO SCALE)